

HEATHER E. WILLIAMS, #122664
Federal Defender
MIA CRAGER, #300172
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: (916) 498-5700

Attorney for Defendant
JARIN CRUZ-ROSALES

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No 2:22-cr-00190-JAM
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE
vs.)	
)	
JARIN CRUZ-ROSALES)	Date: January 23, 2024
)	Time: 9:00 a.m.
)	Judge: John A. Mendez
Defendant.)	
_____)	

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney through James Conolly, Assistant United States Attorney, attorneys for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal Defender Mia Crager, attorneys for Jarin Cruz-Rosales, that the status hearing be continued to April 23, 2024, and that the Court exclude time pursuant to the Speedy Trial Act.

The government just produced discovery in the form of data copied from two cell phones. The data is voluminous and defense counsel will need time to review it and discuss it with her client.

Defense counsel believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

The government does not object to the continuance.

1 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
2 excluded from this order's date through and including April 23, 2024, as previously ordered,
3 pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General
4 Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

5 Dated: January 19, 2024

6 HEATHER E. WILLIAMS
Federal Defender

7
8 /s/ Mia Crager
MIA CRAGER
Assistant Federal Defender
9 Attorney for Defendant
JARIN CRUZ-ROSALES
10

11 Dated: January 19, 2024

12 PHILLIP A. TALBERT
United States Attorney

13 /s/ James Conolly
14 JAMES CONOLLY
Assistant United States Attorney
15 Attorney for Plaintiff
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including April 23, 2024, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). **It is further ordered** the January 23, 2024 status conference shall be continued until **April 23, 2024, at 9:00 a.m.**

Dated: January 19, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE